

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
PHILADELPHIA DIVISION**

<b>In re:</b>  <b>William A. Simmons,</b>  <b>Debtor</b>  <b>U.S. Bank Trust National Association, not in its individual capacity but solely as owner trustee for RCF 2 Acquisition Trust,</b>  <b>Movant</b>  <b>v.</b>  <b>William A. Simmons,</b>  <b>Debtor/Respondent</b>  <b>Tanya M Simons,</b>  <b>Co-Debtor/Respondent</b>  <b>KENNETH E. WEST, Esquire</b>  <b>Trustee/Respondent</b>	<b>Bankruptcy No. 18-15517-pmm</b>  <b>Chapter 13</b>  <b>Hearing Date: October 25, 2023</b> <b>Hearing Time: 1:00 P.M.</b> <b>Location: Robert N.C. Nix Sr. Federal Courthouse, 900 Market Street, Suite 201, Philadelphia, PA 19107</b>
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**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

U.S. Bank Trust National Association, not in its individual capacity but solely as owner trustee for RCF 2 Acquisition Trust has filed a Motion for Relief from the Automatic Stay pursuant to 11 U.S.C. §362(d)(1); for costs and disbursements of this action, and for such other and further relief as to the Court may deem just and proper.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

- 1. If you do not want the court to grant the relief sought in the Motion or if you want the court to consider your views on the motion, then on or before October 10, 2023, you or your attorney must filed a response to the Motion. (see *Instructions on next page*).**

- (a) File an answer explaining your position at: Robert N.C. Nix Sr. Federal Courthouse, 900 Market Street, Suite 201, Philadelphia, PA 19107.**

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough that it will be received on or before the dates stated above; and

(b) Mail a copy to the movant's attorney:

Michelle L. McGowan, Esquire  
13010 Morris Rd., Suite 450  
Alpharetta, GA 30004  
PA Bar Number 62414  
Email: mimcgowan@raslg.com

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 19(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
3. **A hearing on the Motion** is scheduled to be held before **Judge Patricia M. Mayer** on **October 25, 2023, at 1:00 p.m. in Courtroom #1, United States Bankruptcy Court, Robert N.C. Nix Sr. Federal Courthouse, 900 Market Street, Suite 201, Philadelphia, PA 19107**. Unless the court orders otherwise, the hearing on this contested matter will be an **evidentiary hearing**.
4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
5. You may contact the Bankruptcy Clerk's Office in Philadelphia at 215-408-2800 or Reading at 610-208-5040 to find out whether the hearing has been canceled because no one filed a response.

Date: 09/25/2023

**Robertson, Anschutz, Schneid, Crane  
& Partners, PLLC**

Attorney for Secured Creditor  
13010 Morris Rd., Suite 450  
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Telephone: 470-321-7112

By: /s/ Michelle L. McGowan  
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